FW: EPA' Comments on the QAPP for CSO Monitoring under the CSOs UAO

Tsiamis, Christos

Thu 12/23/2021 10:43 AM

To: Carr, Brian <Carr.Brian@epa.gov>

1 attachments (37 KB)

NYC QAPP Comments 12-22-21 jas.docx;

FYI

From: Tsiamis, Christos
Sent: Thursday, December 23, 2021 10:43 AM
To: Clarke, Kevin <kclarke@dep.nyc.gov>
Cc: Singerman, Joel <Singerman.Joel@epa.gov>
Subject: EPA' Comments on the QAPP for CSO Monitoring under the CSOs UAO

Kevin,

I am attaching EPA's comments on the following document:

"Quality Assurance Project Plan for Environmental Investigations at the Gowanus Canal Superfund Site: Post Remedy Monitoring Plan."

The document was submitted by Angela Licata, of NYCDEP, on November 1, 2021, in accordance with the UAO requirements.

Please, provide explicit responses to our comments, revise the document accordingly, and re-submit it for our review and approval.
Your agency's responses and the revised document should be submitted to EPA within four weeks from today.

Sincerely,

Christos Tsiamis
Senior Project Manager
New York Remediation Branch
USEPA, Region 2
New York, NY

Below are our comments on the combined sewer overflow (CSO) Quality Assurance/Quality Control Plan (QAPP) for the monitoring of the CSOs in the Gowanus Canal, submitted by New York City (NYC) on November 1, 2021, pursuant to the March 29, 2021 Unilateral Administrative Order (UAO), as amended on June 29, 2021. Our comments focus on four main issues:

1. Monitoring Plan
2. Annual Tracking of Solids Loading from Each CSO Outfall
3. Sampling Locations at RH-034 and OH-007
4. Sample Solids and Contaminant Measurements

Monitoring Plan

The amended UAO requires the submission of two documents:

1. A Monitoring Plan (Paragraph 73.e).
2. A QAPP prior to the commencement of any data collection or other monitoring (Paragraph 75).

The following is noted:

- NYC's November 1, 2021 transmittal letter states that its submission is the monitoring plan. However, the title of the document is "Quality Assurance Project Plan for Environmental Investigations at the Gowanus Canal Superfund Site: Post Remedy Monitoring Plan." The Monitoring Plan and the QAPP are required to be two separate documents as per the UAO paragraphs 73.e and 75.
- Although a portion of the title of the document includes a "Post Remedy Monitoring Plan," it follows a QAPP format and the note at the bottom of page 1 states: "Note: This QAPP has been prepared…." Therefore, it does not appear that a Monitoring Plan was submitted.

Annual Tracking of Solids Loading from Each CSO Outfall

- QAPP Worksheet 10 on page 10 partially states the amended UAO requirements, but it omits the specification that the Monitoring Plan include "… annual tracking of CSO solids loading from each CSO outfall."
- The document describes how sampling will be performed at only two outfalls (RH-034 and OH-007), not at each CSO outfall discharging to Gowanus Canal. Because there are 11 CSO outfalls discharging to the canal (NYCDEP 2015 CSO LTCP for Gowanus Canal, Table 6-3), the document should describe the sampling at each CSO outfall or provide an explanation as to why sampling will not be performed at each outfall.
- The document only presents the sampling that will be performed at the two CSO outfalls, but it does not include "a detailed description for how the CSO outfall solids loading is calculated" as required by the amended UAO. Specifically, how will NYC use the pollutant concentrations measured in its CSO samples, collected 4 times per year, to calculate annual loadings at each of the 11 outfalls discharging to the canal?
- QAPP Worksheet 10 incorrectly presents "The environmental questions being asked:" focuses only on "CSO outfalls OH-007 and RH-034," not at each outfall as required in the amended UAO.

Sampling Locations at RH-034 and OH-007

- QAPP Worksheet 17 on page 68 presents the Sampling Design and Rationale. Figure 2 presents the "CSO Sampling Locations (RH-034 and OH-007)." As discussed above, the document omits sampling the other 9 CSO outfalls discharging to Gowanus Canal.
- For the RH-034 sampling location, there is a note on Figure 2, "Note: a site visit is needed to confirm the sampling location." The picture appears to be a construction site at the Gowanus Pump Station. The document states NYC will sample the regulators "approximately one block from the discharge points, to eliminate the influence of the Canal on the samples." We note the following:

    - The document does not determine the RH-034 sampling location. The sampling location should be confirmed in detail in this document.
    - Unless the tide gates are leaking and causing inflow into the collection system (which would be a potential violation of NYC's permit), there should be no influence of the canal on samples regardless of where CSO-representative samples are collected during an overflow event.
    - Our understanding from the document is that sampling would take place on Butler Street outside the Gowanus Pump Station property and upstream of the RH-034 regulator. Because combined sewers come from two directions on Butler Street, if only one side is sampled, the loading from the other side of the sewer service area will not be included in the calculation for total loadings.
    - NYC should consider sampling the Gowanus Pump Station when wet weather flows are apparent after the rain starts. It's safer than being in the street, shouldn't be influenced by the canal, and will be representative of everything that is either pumped to the Red Hook Wastewater Resource Recovery Facility and/or discharged to the canal.

- For OH-007, the sampling location appears to be at a manhole on 2nd Avenue upstream or at the diversion chamber and upstream of the filled grit chamber and tide gates. If our understanding is correct, that sampling location is satisfactory.

Sample Solids and Contaminant Measurements

The sample collection and testing methods the City intends to use for solids, metals, PAHs, etc. appear to be reasonable and consistent with the sampling/testing performed by EPA for the remedial investigation.